

### **REMARKS**

Claims 87-90 are added herein. Claims 1-90 now remain pending in the application, with claims 31-55 and 67-85 withdrawn from consideration by a Restriction Requirement.

#### **Claims 1-6, 8-17, 23-27, 30, 56-66 and 86 over Jamtgaard in view of Allen**

In the Office Action, claims 1-6, 8-17, 23-27, 30, 56-66 and 86 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,430,624 to Jamtgaard et al. ("Jamtgaard") in view of U.S. Patent No. 6,877,095 to Allen ("Allen"). The Applicants respectfully traverse the rejection.

Claims 1-6, 8-17, 23-27, 30, 56-66 and 86 recite a system and method of session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a type of device originating a request, a hypertext history and a content provider state maintained for a back-end information source.

The Office Action acknowledges that Jamtgaard fails to disclose a session manager that examines content to identify and return state based information. The Office Action relies on Allen to allegedly make up for the deficiencies in Jamtgaard to arrive at the claimed features. The Applicants respectfully disagree.

The Examiner points to Allen to disclose state based information as a session token that a content provider needs to perform transactions on behalf of devices (See Office Action, page 3). However, Allen's alleged state based information is a token that is used to determine user identification and logon validity/expiration (See Allen, col. 5, lines 5-11). Allen fails to disclose or suggest state based information comprising at least one of a type of device originating a request, a hypertext history, and a content provider state maintained for a back-end information source, as recited by claims 1-6, 8-17, 23-27, 30, 56-66 and 86.

Thus, Jamtgaard modified by the disclosure of Allen would still fail to disclose or suggest a system and method of session managing to examine

data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a type of device originating a request, a hypertext history and a **content provider state** maintained for a back-end information source, as recited by claims 1-6, 8-17, 23-27, 30, 56-66 and 86.

Moreover, modifying Jamtgaard with the disclosure of Allen is **nonsensical**. Jamtgaard's invention is directed toward a translation server that includes a virtual browser for executing web content that an information appliance cannot execute (See at col. 5, lines 27-53). Allen's invention is directed toward sending tokens to a user on a client of a server. However, it is Jamtgaard's translation server that is performing browser functions. Modifying Jamtgaard to send a token to a user on a client of a server would be **nonsensical** since the token would have to be used by the translation server that executes a virtual browser. Thus, sending a token to a device that could not use the information included in the token is **nonsensical**.

The Examiner argues in response to the **nonsensical** modification of Jamtgaard that it would have been obvious to "create the method of receiving, translating, and transforming content as taught by Jamtgaard while employing a session manager as taught by Allen in order to improve scalability, speed, efficiency, reliability, and security (Allen: col. 4, lines 49-57)." However, Allen specifically discloses that "storing session-state information at any of the tiers impacts scalability, speed, efficiency, reliability, or security." Thus, Allen discloses storing session-state information at any of tiers impacts scalability, speed, efficiency, reliability, or security. The Examiner has not shown how modifying Jamtgaard with Allens' tokens would improve scalability, speed, efficiency, reliability, and security.

Moreover, the Examiner questions if "the claimed invention would not like improved scalability, speed, efficiency, reliability, and security". The Examiner is modifying Jamtgaard to arrive at the alleged benefits. Whether the

claimed invention would “like” improved scalability, speed, efficiency, reliability, and security is **irrelevant**.

A benefit of examining data content communicated between a device and a content provider and to identify and return state-based information comprising at least one of a type of device originating a request, a hypertext history and a content provider state maintained for a back-end information source is, e.g., allowing more accurate tracking of a session for processing. Returning at least one of a hypertext history and a content provider state allows a device that normally lacks such features with a particular application to have full access to features that are related to a hypertext history and a content provider state. The cited prior art fails to disclose or suggest the claimed features having such benefits.

Accordingly, for at least all the above reasons, claims 1-6, 8-17, 23-27, 30, 56-66 and 86 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 7 and 29 over Jamtgaard in view of Allen and Namma**

In the Office Action, claims 7 and 29 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Jamtgaard in view of U.S. Patent No. 6,182,116 to Namma et al. (“Namma”). The Applicants respectfully traverse the rejection.

Claims 7 and 29 are dependent on claims 1 and 9, and are allowable for at least the same reasons as claims 1 and 9.

Claims 7 and 29 recite a system and method of session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a hypertext history and a content provider state maintained for a back-end information source.

As discussed above, Jamtgaard in view of Allen fails to disclose or suggest a system and method of session managing to examine data content

communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a hypertext history and a content provider state maintained for a back-end information source, as recited by claims 7 and 29.

Namma is relied on to disclose sending data to more than one content provider (See Office Action, page 12). However, Namma fails to disclose anything related to session managing, much less disclose or suggest a system and method of session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a hypertext history and a content provider state maintained for a back-end information source, as recited by claims 7 and 29.

Accordingly, for at least all the above reasons, claims 7 and 29 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 18-22 over Jamtgaard in view of Allen and Nielson**

In the Office Action, claims 18-22 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Jamtgaard in view of Allen, and further in view of U.S. Patent No. 5,899,975 to Nielson ("Nielson"). The Applicants respectfully traverse the rejection.

Claims 18-22 are dependent on claim 9, and are allowable for at least the same reasons as claim 9.

Claims 18-22 recite method of session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a hypertext history and a content provider state maintained for a back-end information source.

As discussed above, Jamtgaard in view of Allen fails to disclose or suggest a system and method of session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a hypertext history and a **content provider state maintained for a back-end information source**, as recited by claims 18 and 22.

The Office Action relies on Nielson to allegedly make up for the deficiencies in Jamtgaard in view of Allen to arrive at the claimed invention. The Applicants respectfully disagree.

Nielson is relied on to disclose two style sheets that are selected and applied independently to a second data at Nielson, col. 7, lines 31-36, and the capabilities of style sheets adding additional functionality and a much more pleasing and semantically consistent presentation for a user at col. 1, lines 54-57 and col. 8, lines 28-29 (See Office Action, page 13).

Nielson appears to disclose using a style sheet for the generating audio information generated by a voice synthesizer from text (Abstract). Applicants' style sheet is related to control a translator and/or transformer in a communication path between a client and a content provider. Thus, Jamtgaard modified by Nielson would result in Jamtgaard using a style sheet to control the sound produced by audio information by a voice synthesizer, which is **nonsensical** since Jamtgaard fails to even disclose use of a voice synthesizer.

Moreover, Nielson fails to disclose session managing a session between a device and a content provider. Thus, Jamtgaard modified by the disclosures of Allen and Nielson would still fail to disclose, teach or suggest a method of session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a hypertext history and a **content provider state maintained for a back-end information source**, as recited by claims 18-22.

Accordingly, for at least all the above reasons, claims 18-22 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 28 over Jamtgaard in view of Allen and McCartney**

In the Office Action, claim 28 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Jamtgaard in view of U.S. Patent Publication No. 2002/0010716 to McCartney et al. ("McCartney"). The Applicants respectfully traverse the rejection.

Claim 28 is dependent on claim 9, and is allowable for at least the same reasons as claim 9.

Claim 28 recites a method of session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a hypertext history and a **content provider state maintained for a back-end information source**.

McCartney is relied on to disclose querying a provider database, receiving a previously registered XSL style sheet associated with a new content provider from a provider database, and optimizing a web site for clients having different capabilities (See Office Action, page 14).

McCartney discloses a system and method that generates web pages optimized for a client's capabilities, such as browser type, browser version, available transfer rate, display capabilities, and terminal device capabilities (Abstract). A server generates the web pages optimized for the client's capabilities (McCartney, Figs. 2 and 3).

McCartney discloses creation of original content web pages optimized for a client's capabilities, **NOT** session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, much less disclose or suggest state based information

comprising at least one of a hypertext history and a **content provider state maintained for a back-end information source**, as recited by claim 28.

Thus, Jamtgaard modified by the disclosures of Allen and McCartney would STILL fail to disclose, teach or suggest a system and method of session managing to examine data content communicated between a device and a content provider and to identify and return state-based information based on interactions between the devices and said content provider, the state based information comprising at least one of a hypertext history and a **content provider state maintained for a back-end information source**, as recited by claim 28.

Accordingly, for at least all the above reasons, claim 28 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

### **Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,  
MANELLI DENISON & SELTER PLLC



William H. Bollman  
Reg. No.: 36,457  
Tel. (202) 261-1020  
Fax. (202) 887-0336

### **MANELLI DENISON & SELTER PLLC**

2000 M Street, NW 7<sup>TH</sup> Floor  
Washington, DC 20036-3307  
TEL. (202) 261-1020  
FAX. (202) 887-0336

WHB/df